The Claimed Invention

The invention disclosed and claimed in the present application is generally directed to a

portable terminal system that permits a user of the portable terminal to connect to a network,

such as the Internet, and retrieve and review, on the portable terminal, desired data from a server

on the network. More specifically, the claimed invention provides novel features related to ease

of use of the portable terminal and, thus, easier data retrieval. For example, a portable terminal

in accordance with the invention receives data that has been segregated by an information source

server into at least two different distinct categories. These two categories of data include

information data that is referred to as "text content", and operation procedure data which is

referred to as "help content".

Segregation of the data into the above-mentioned two categories enables the portable

terminal to provide unique features to terminal users. For example, when help content associated

with particular text content is received by the portable terminal, a display processor and an input

processor, each specifically designated to handle help content, process the data and control the

portable terminal to provide assistance to the terminal user in retrieving and analyzing the text

content. Certain unique features, such as back-lighting or vibrating certain input keys and/or

providing audible or graphic commands to the user, are activated to assist the user and provide

easier retrieval of the text content.

In accordance with the disclosed invention, claim 1 recites, *inter alia*:

> a server storing text contents which are supposed
> to be displayed at a display section of a portable
> terminal, and **help contents** which show a method of
> utilizing said text contents; and

> a portable terminal including a text browser
> provided for use in perusing the text contents stored
> in said server, and a **help browser** provided for use in
> perusing the help contents also stored in said server.

Dozier et al.

Dozier et al., in comparison, "addresses the critical needs of publishers seeking to create

and publish hypermedia content in electronic form across wide area networks ("WANS's")."

(Abstract). A system in accordance with Dozier et al. provides a "seemless" user interface for

accessing, editing and storing hypermedia documents on one or more servers on a WAN, such as

the Internet. The invention disclosed in Dozier et al. has nothing to do with the invention

claimed in the present application. For example, Dozier et al. does not teach, or even suggest,

help contents that show a method of utilizing text contents. Dozier also fails to teach or suggest

a *help browser* for perusing the *help contents*. Instead of providing separate browsers, including

a help browser for analyzing help content designed to assist users navigate and use text content,

Dozier et al. discloses a method for unifying the conventionally separate functions of browsing

for hypermedia documents and editing those documents once they are found. (Col. 7, lines 46-

65).

Claim 1

The Examiner asserts that the "anchor items" disclosed by Dozier et al within column 14,

lines 24-42 are the same as the claimed "help contents". In response, Applicant respectfully

submits that the anchor items of Dozier et al. are completely different than the claimed help

contents. Specifically, "[a]n 'anchor' item is an item of content within a source document

encoded as a hypermedia link; users 'click' on anchor items to bring up linked target documents." (Col. 14, lines 30-33). A facility known as "NaviLinks" opens a window on the user's display and several potential links, or targets, are displayed that will connect the user to additional information when the hyperlink is 'clicked'. A list of suggested anchor items and potential targets, i.e., links, "are generated automatically, preferably using statistical language processing techniques such as provided in the Xerox Lexical Technology ("XLT") package commercially available from the Xerox Corporation." (Col. 14, lines 39-42). Accordingly, the anchor items of Dozier et al. are for directing a user to additional text content available for certain identified items within a hypermedia document. The anchor items are clearly not the same as "help contents which show a method of utilizing [the] text contents", as claimed. For at least this reason, Dozier et al. does not teach or otherwise disclose the recited help contents on claim 1 and the rejection of claim 1 over Dozier et al. under 35 U.S.C. §102 should be withdrawn.

Furthermore, contrary to the assertion of the Examiner, Dozier et al. does not disclose "a *help browser* provided for use in perusing the help contents." The passage cited by the Examiner in Dozier as teaching this claimed feature is column 14, lines 29-53. The cited passage, however, discloses nothing regarding a browser for perusing *help contents*, as discussed above. The window that is automatically opened in Dozier et al., i.e., window 124 of Fig. 8a, shows a list of potential anchor items, e.g., list 126, and a corresponding suggested link list, e.g., list 128. The links can then be automatically encoded directly onto the anchor item in the source document. (Col. 14, lines 43-53).

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The feature of being able to automatically add encoded links that automatically connect a

user/reader of the hypermedia document is not the same as having a separate help browser that

reads help content data that assists the user by showing the user "a method of utilizing the text

content," for example by disabling certain keys on the portable terminal and lighting or vibrating

certain other, enabled, keys used to provide input to the portable terminal. For this additional

reason, Dozier et al. does not anticipate claim 1 under 35 U.S.C. § 102 and the rejection of claim

1 should be withdrawn.

Claims 2-9

For at least the same reasons as those set forth above in regard to claim 1, and because

Pepe et al. does not compensate for the deficiencies of Dozier et al., claims 2-9, which depend

from claim 1, also define subject matter that is patentable over the cited prior art.

Claim 10

For similar reasons as those set forth above in regard to claim 1, Dozier et al. does not

teach or disclose at least the help browser recited in claim 10. Accordingly, Dozier et al. does

not anticipate claim 10 and the rejection thereto should be withdrawn.

Claims 11-17

For at least the same reasons as those set forth above in regard to claim 10, and because

Pepe et al. does not compensate for the deficiencies of Dozier et al., claims 11-17, which depend

from claim 10, also define subject matter that is patentable over the cited prior art.

Claims 18-19

For similar reasons as those set forth above in regard to claim 1, Dozier et al. does not teach or disclose at least the help browser recited in claim 18. Additionally, Dozier et al. does not teach or suggest activating either a text browser or a help browser based on the result of a judging step, as explicitly recited in claim 18. Pepe et al. does not teach this recited feature either. For at least these reasons, the combination of Dozier et al. and Pepe et al. does not disclose the recited subject matter of claim 18 and the rejection thereto should be withdrawn.

For at least the same reasons as those set forth above in regard to claim 18, claim 19, which depends from claim 18, also defines subject matter that is patentable over the cited prior art. Furthermore, neither of the cited references teach or disclose outputting help contents as text, voice, static images moving images, or any combination of these formats, as explicitly recited in claim 19. Accordingly, for this additional reason, the rejection of claim 19 should be withdrawn.

Claims 20-21

For at least the same reasons as those set forth above in regard to claim 10, i.e., with respect to the help browser and help message, claim 20 defines subject matter that is patentable over the cited prior art. Additionally, however, neither Dozier et al. nor Pepe et al. teach or suggest *judging* whether an inputted message is a text message or a help message, or *activating* either a text browser or a help browser based on the result of the judgement. For this additional reason, claims 20-21 are patentable over the combination of Dozier et al. And Pepe et al. and the rejection should be withdrawn.

Claim 22

For at least similar reasons as those set forth above in regard to claim 10, i.e., with respect to the help browser and help message, claim 22 defines subject matter that is patentable over the cited prior art.

Additionally, Dozier et al. does not teach or suggest, an *information source server* that can separately store both target content as well as help content, *wherein the help content is ancillary to the target content and is provided to assist in retrieval of the target content,* as required by claim 22.

Dozier et al. also does not teach or suggest either a *wireless device*, as claimed in claim 22, or a *radio gateway server connected to both a wireline and wireless network.*

For all of the above reasons, Dozier et al. does not anticipate claim 22 and the rejection of claim 22 should be withdrawn.

Claims 23-26

For at least the same reasons as those set forth above in regard to claim 22, and because Pepe et al. does not compensate for the deficiencies of Dozier et al., claims 23-26, which depend from claim 22, also define subject matter that is patentable over the cited prior art and the rejection of claims 23-26 should be withdrawn.

Claim 27

For at least similar reasons as those set forth above in regard to claim 10, i.e., with

respect to the help browser and help data, claim 27 defines subject matter that is patentable over

the cited prior art.

Additionally, neither Dozier et al. nor Pepe et al. teach or suggest a help display

processor operable to display help data that is *exclusively for assisting in retrieval of the target

data*. For this additional reason, claim 27 defines subject matter patentable over the proposed

combination of Dozier et al. and Pepe et al. and the rejection of claim 27 should, accordingly, be

withdrawn.

Claims 28-29

For at least the same reasons as those set forth above in regard to claim 27, claims 28-29,

which depend from claim 27, also define subject matter that is patentable over the cited prior art

and the rejection of claims 28-29 should be withdrawn.

Conclusion

In view of the foregoing remarks, the application is believed to be in form for immediate

allowance with claims 1-29 and such action is hereby solicited. If any points remain in issue

which the Examiner feels may be best resolved through a personal or telephone interview, he or

she is kindly requested to **contact the undersigned attorney** at the telephone number listed

below.

Request for Reconsideration under 37 C.F.R. § 1.111
U.S. Appln. No. 09/680,479

      The USPTO is directed and authorized to charge all required fees, except for the Issue

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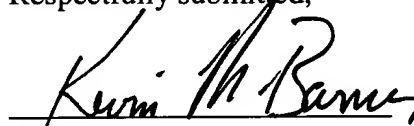overpayments to said Deposit Account.

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